

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

BED BATH & BEYOND INC., et al.

Case No.: 23-13359 (VFP)

Adv. Pro. No.: _____

Chapter: 11

Subchapter V: ☐ Yes ☐ No

Hearing Date: January 9, 2024

Judge: Vincent F. Papalia

ADJOURNMENT REQUEST

1. I, Colin R. Robinson,

☒ am the attorney for: Plan Administrator,

☐ am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Debtors' Motion to Determine Tax Liability and Stay Proceedings [Docket No. 2157]; Debtors' Motion to Determine Tax Liability and Stay Proceedings as to Certain California Taxing Authorities [Docket No. 2181]; Joint Motion of Texas Taxing Authorities to Compel Payment of Remaining Amounts Due on Year 2022 Ad Valorem Business Personal Property Taxes [Docket No. 2664].

Current hearing date and time: January 9, 2024 at 10:00 a.m.

New date requested: February 14, 2024 at 10:00 a.m

Reason for adjournment request: The Plan Administrator has negotiated approximately 19 resolutions with various Texas and California counties. In discussions with the Texas Taxing Authorities (the "TTA"), who represent all remaining Texas Counties, the parties have agreed to adjourn the hearing on the Tax Claim Objections for thirty (30) days in an effort to resolve any remaining disputes and if necessary, establish a briefing schedule for the Court to determine legal issues at the next scheduled hearing. Moreover, the TTA has requested that its motion to compel payment of remaining 2022 Ad Valorem Taxes be adjourned until the next hearing date. No other party has indicated to the Plan Administrator's counsel that they intend to move forward on January 9, 2024 or have an objection to an adjournment of the Tax Claims Objections.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: January 7, 2024

/s/ Colin R. Robinson

COURT USE ONLY:

The request for adjournment is:

- | | | |
|--|---|-------------------------------------|
| <input checked="" type="checkbox"/> Granted | New hearing date: <u>February 14, 2024 at 10 am</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____ | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied | | |

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.